

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Federal Trade Commission,

Plaintiff,

-against-

BlueHippo Funding, LLC and BlueHippo
Capital, LLC,

Defendants.

08 CV 1819 (PAC)

ECF Case

**DECLARATION OF RONALD G. BLUM IN
OPPOSITION TO PLAINTIFF'S MOTION
SEEKING AN ORDER HOLDING
DEFENDANTS IN CIVIL CONTEMPT**

Ronald G. Blum declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member of the bar of this Court and of Manatt, Phelps & Phillips, LLP ("Manatt"), attorneys for defendants BlueHippo Funding, Inc. and BlueHippo Capital, LLC (collectively, "BlueHippo"). I submit this declaration to place before the Court correspondence relevant to BlueHippo's opposition to plaintiff Federal Trade Commission's ("FTC") motion seeking to hold BlueHippo in civil contempt.

2. Attached as Exhibit A are copies of letters from my colleague Linda A. Goldstein to Laureen Kapin of the FTC dated April 29, April 30, May 1, and May 6, 2009.

3. Attached as Exhibit B is a copy of a letter from my colleague Linda A. Goldstein to Laureen Kapin of the FTC dated May 8, 2009.

4. Attached as Exhibit C is a copy of an email from my colleague Michael Yaghi to Laureen Kapin of the FTC dated May 7, 2009.

5. Attached as Exhibit D is a copy of a letter from Malini Mithal of the FTC to my colleague Linda A. Goldstein dated May 21, 2009.

6. Attached as Exhibit E is a copy of a letter from my colleague Linda A. Goldstein to Laureen Kapin of the FTC dated May 28, 2009.

7. Attached as Exhibit F is a copy of a letter from my colleague Michael Yaghi to Laureen Kapin of the FTC dated July 2, 2009.

8. Attached as Exhibit G is a copy of a letter from my colleague Linda A. Goldstein to Julie A. Mack of the FTC dated February 12, 2009.

Executed in New York, New York on July 6, 2009.

s/ Ronald G. Blum
RONALD G. BLUM